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December 13, 2019

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMORANDUM ENDORSED

Re: United States v. Natalie Mayflower Sours Edwards, 19 Cr. 64 (GHW)

Dear Judge Woods:

We represent the defendant in the above-referenced case. Under the current schedule, both the government and defense must file their motions *in limine* and other pretrial materials (including requests to charge, proposed verdict forms, and proposed *voir dire*) by Friday, December 20, 2019. Counsel has recently informed the government, however, that the defense is likely to assert a public-authority defense at trial. This defense will have significant effect on the nature of the motions *in limine* and other pretrial materials that the parties will need to file. Consequently, with the consent of the government, counsel is respectfully requesting an adjournment of the current pretrial deadlines. This adjournment will also provide the parties with sufficient time to continue the productive discussions relating to a potential disposition of this matter and to address any possible discovery or other issues relating to the potential superseding indictment that the government raised at the last court appearance. Accordingly, the parties propose the following modification of the motion schedule:

- December 23, 2019: counsel must provide the government with written notice, consistent with Federal Rule of Criminal Procedure 12.3, as to whether the defense intends to assert a public-authority defense at trial and the nature of that defense;
- January 21, 2020: motions *in limine* and other pretrial materials due;
- February 3, 2020: response to motions *in limine* due;
- February 7, 2020: replies to motions *in limine* due.


Respectfully submitted,

Jacob Kaplan
Jacob Kaplan, Esq.

Application granted. The Court adopts the schedule as set forth in the defendant's letter.

SO ORDERED.

Dated: December 19, 2019
New York, New York


GREGORY H. WOODS
United States District Judge